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Libby Asbestos Site Team Leader

Ms. Katherine Hernandez, U.S. Environmental Protection Agency
Remedial Project Manager

Mr. Mark Raney, John A. Volpe Center National Transportation Systems Center
Task Order Contracting Officer's Technical Representative

Subject: Draft Data Gap Analysis for Potential Contaminated Media,
Railyard and Railways, Operable Unit 6

Dear Mr. Peronard, Ms. Hernandez, and Mr. Raney:

The purpose of this letter is to present data gaps between investigations already conducted and information needed to support a risk assessment and remedial investigation (RI) specific to the Operable Unit (OU) 6. The data gaps were determined by reviewing all existing data for the site as presented in the Data Summary Report (DSR) for OU6 and comparing the data set to the conceptual site model (CSM), Figure 1. It is recommended that the data gaps identified and discussed be addressed as part of completing the risk assessment and RI for OU6.

The CSM for OU6 (Figure 1) identifies several potential exposure pathways resulting in nine contaminated media of concern:

- Outdoor air near structural fire location
- Air in attic or near other unenclosed vermiculite
- Indoor air near breached walls
- Outdoor air near rail lines
- Indoor air (on-site buildings)
- Dust in air of vehicles

- Outdoor air near disturbed soil
- General (ambient) outdoor air
- Dust in air from disturbances of roofing or other outdoor surfaces

This memorandum is organized to identify data gaps by the nine media of concern.

Outdoor Air near Structural Fire Location

Outdoor air near structural fire locations has not been evaluated specific to potential exposures at OU6. It is currently unknown whether the depot building within the railyard contains vermiculite insulation. Attempts to gain access to this building during the 2002 and 2003 Contaminant Screening Study were unsuccessful. Additional attempts should be made to gain access to this building for the purposes of determining if vermiculite insulation is present in this building. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

Air in Attic or near Other Unenclosed Vermiculite

Air in attics or near other unenclosed areas of vermiculite has not been evaluated specific to potential exposures at OU6. As mentioned above, the presence or absence of vermiculite insulation in the depot building is currently unknown. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

Indoor Air near Breached Walls

Indoor air near breached walls has not been evaluated specific to potential exposures at OU6. As mentioned above, the presence or absence of vermiculite insulation in the depot building is currently unknown. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

Outdoor Air near Rail Lines

Outdoor air near rail lines specific to OU6 will be evaluated with data collected from the processing area ambient air expansion program initiated in July 2007 and scheduled to be completed in July 2008. Therefore, additional sample collection is not recommended specific to this media of concern.

Indoor Air (On-Site Buildings)

Indoor air has not been evaluated specific to potential exposures at OU6. Exposure to this media of concern is likely for workers and travelers using the depot building and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

Dust in Air of Vehicles

Air in vehicles has not been evaluated specific to potential exposures at OU6. Exposure to this media of concern is expected to be limited within this OU and therefore sampling to evaluate this specific media of concern is not considered necessary specific to this OU.

Outdoor Air near Disturbed Soil

Outdoor air near disturbed soils is a media of concern that has not been evaluated specific to OU6. It is recommended that an OU specific activity-based sampling program be developed to determine potential exposures to commercial workers, tradespersons, and recreational visitors for this OU.

General Outdoor Ambient Air

Information from the current outdoor ambient air program, initiated in October 2006 and scheduled to be completed in October 2008, will fill the data gap for determining outdoor ambient air exposures. Therefore, additional sample collection is not recommended specific to this media of concern.

Dust in Air near Disturbances of Roofing or Other Outdoor Surfaces

Air near disturbances of roofing or other outdoor surface has not been completed specific to OU6. Exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

Summary

The following table summarizes each of the nine media of concern discussed above and indicates if a data gap currently exists specific to OU6 for each media.

Draft Data Gap Analysis – Railyard and Rail line Right of Way, OU6

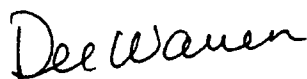
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Media of Concern	Current Data Sufficient to Determine Exposure (Yes/No)	Additional Sampling Recommended (Yes/No)	Comments
Outdoor air near structural fire location	No	TBD	The presence or absence of vermiculite insulation should be investigated for the depot building before requirements for additional sampling can be determined.
Air in attic or near other unenclosed vermiculite			
Indoor air near breached walls			
Outdoor air near rail lines	No	Yes	Outdoor ambient air sampling, including locations specific for OU6, is currently on-going. Samples required to evaluate this media of concern will be collected by continuing this program.
Indoor air (on-site buildings)	No	Yes	
Dust in air of vehicles	No	Yes	
Outdoor air near disturbed soil	No	Yes	
General (ambient) outdoor air	No	Yes	Outdoor ambient air monitoring program currently on-going to collection samples for evaluation of this media of concern
Dust in air from disturbances of roofing or other outdoor surfaces	No	Yes	

If you have any questions or concerns, please feel free to contact me at (720) 264-1121.

Very truly yours,



Dee Warren
CDM Federal Programs Corporation

Cc: Chris Weis, USEPA
Amishi Castelli, Volpe Center
Jeff Montera, CDM Project Manager

FIGURE 1. CONCEPTUAL SITE MODEL FOR INHALATION EXPOSURES TO ASBESTOS
Libby Superfund Site -- Operable Unit 6 (BNSF Railroad right-of-way within the boundaries of OU4)

